

Mark T. Power, Esq.
Jeffrey Zawadzki, Esq.
HAHN & HESSEN LLP
488 Madison Avenue
New York, New York 10022
(212) 478-7200

*Proposed Counsel to The Official Committee of
Unsecured Creditors of Navillus Tile, Inc.*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

In re:

Chapter 11

NAVILLUS TILE, INC., DBA NAVILLUS
CONTRACTING,

Case No. 17-13162 (SHL)

Debtor.

-----X

**THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS' RESPONSE
TO MOTION TO SHORTEN NOTICE OF HEARING TO CONSIDER
MOTION OF NAVILLUS TILE, INC. FOR AN ORDER (I) AUTHORIZING
THE DEBTOR TO (A) MAKE PAYMENTS TO ELIGIBLE EMPLOYEES
UNDER THE PERFORMANCE BONUS PROGRAM AND (B) CONTINUE
THE PERFORMANCE BONUS PROGRAM IN THE ORDINARY COURSE
OF BUSINESS; (II) APPROVING THE KEY EMPLOYEE INCENTIVE
PROGRAM; AND (III) GRANTING RELATED RELIEF**

The Official Committee of Unsecured Creditors (the "Committee") of the above-captioned debtor and debtor-in-possession (the "Debtor"), by its proposed counsel, Hahn & Hessen LLP, hereby files this response to the *Motion to Shorten Notice of Hearing to Consider Motion of Navillus Tile, Inc. for an Order (I) Authorizing the Debtor to (A) Make Payments to Eligible Employees Under the Performance Bonus Program and (B) Continue the Performance Bonus Program in the Ordinary Course of Business; (II) Approving the Key Employee Incentive Program; and (III) Granting Related Relief* [D.I. 104] (the "Motion"), and respectfully states as follows:

RESPONSE

1. In response to the Debtor's request that the Committee consent to the Bonus Motion¹ being heard by the Court on December 20, 2017, the Committee requested that the Debtor bifurcate the hearing with (a) payment of Performance Bonuses that have accrued and are due to non-insiders and non-senior management considered at a preliminary hearing on December 20, and (b) the balance of the relief sought by the Bonus Motion considered at the next omnibus hearing in January. The Committee's consent is predicated, however, on the Committee being provided with full disclosure and complete information about the Performance Bonus Program in response to its requests.

2. To the extent that the information requested by the Committee regarding the Performance Bonus Program is not forthcoming, the Committee reserves the right to object to the Motion at the December 20th hearing and seek an adjournment of all or part of the Bonus Motion.

Dated: New York, New York
December 12, 2017

Respectfully submitted,

HAHN & HESSEN LLP

/s/ Mark T. Power
Mark T. Power, Esq.
Jeffrey Zawadzki, Esq.
488 Madison Avenue
New York, New York 10022
(212) 478-7200

*Proposed Counsel to The Official Committee of
Unsecured Creditors of Navillus Tile, Inc.*

¹ All capitalized terms not otherwise defined herein shall have the meaning ascribed to those terms in the Motion.